

Paralegal-2@LawOfficesMRN.com

From: Paralegal-2@LawOfficesMRN.com
Sent: Friday, December 8, 2023 10:45 AM
To: 'Chris Miltenberger'; 'MNevarez@LawOfficesMRN.com'
Subject: RE: Callier v. PAC WESTERN FINANCIAL LLC et al; Cause #3:22-cv-00301-FM

Tracking:	Recipient	Read
	'Chris Miltenberger'	
	'MNevarez@LawOfficesMRN.com'	
	Robert L. Sharpe Jr. (Associate-2@LawOfficesMRN.com)	
	Associate-2@LawOfficesMRN.com	Read: 12/8/2023 3:18 PM
	mnevarez@lawofficesmrn.com	Read: 12/11/2023 12:24 PM

Hello Mr. Miltenberger,

You will be receiving an invite from Dropbox to have access to the folder of Jascott Investments, LLC. This Dropbox folder includes all of the following:

1. Exhibit A – List of Proposed Exhibits
2. Exhibit B – Ex. A Combined Docs – Bate Stamped
3. Exhibit 02 - 2022-04-08 call-recording-826630361.mp3
4. Exhibit 22 - 2022-04-12 call-recording-830905169.mp3
5. Exhibit 53 - 2022-04-21 call-recording-841806079.mp3
6. Exhibit 59 - 2022-04-22 call-recording-843019490.mp3
7. Please_DocuSign_JaScottLoanApplication_(1)
8. TXSOS Aero Services LLC
9. TXSOS Gonna Keep On Truckin LLC
10. TXSOS Search Results – Brandon Callier
11. 2022-10-14 call-recording-1075916090.mp3

PLEASE CONFIRM RECEIPT OF THIS EMAIL AND THE DROPBOX INVITE.

Thank you,
Denise Dominguez Macias
Paralegal

The Nevarez Law Firm, PC
Attorneys And Counselors At Law
Mailing Address:
P.O. Box 12247
El Paso, TX 79913
Telephone: (915) 225-2255
Facsimiles: (915) 845-3405
Website: <http://www.NevarezLawFirm.com/>

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From: Chris Miltenberger <chris@crmlawpractice.com>

Sent: Friday, December 8, 2023 8:49 AM

To: MNevarez@LawOfficesMRN.com

Cc: paralegal-2@lawofficesmrn.com

Subject: RE: Cause #3:22-cv-00301-FM; Callier v. PAC WESTERN FINANCIAL LLC et al

Michael, You said you would scan and send me the documents. Is that not correct?

I do not have dates for he deposition.

We will need to request that the court extend the mediation deadline.

Once confirmed I will prepare an agreement.

Thank you.

Chris Miltenberger, Esq.

Law Office of Chris R. Miltenberger, PLLC

1360 N. White Chapel Blvd., Suite 200

Southlake, Texas 76092

P: 817-416-5060

Cell: 817-296-0422

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From: MNevarez@LawOfficesMRN.com <MNevarez@LawOfficesMRN.com>

Sent: Friday, December 8, 2023 9:40 AM

To: Chris Miltenberger <chris@crmlawpractice.com>

Cc: paralegal-2@lawofficesmrn.com

Subject: RE: Cause #3:22-cv-00301-FM; Callier v. PAC WESTERN FINANCIAL LLC et al

Chris,

The discovery deadline is this coming Monday, December 11, 2023, and as I told you before over the phone, I have no objection to continuation of the discovery deadline, in accordance with the Scheduling Order. So, please provide a status update regarding the following:

1. Did you arrange for the mediation as per below?
2. Do you have proposed dates for the depositions to be held after the first of the year, for Callier and Scott?
3. Do you have proposed dates for your inspection and copying of my clients' documents?
4. Will you prepare a written agreement between counsel extending the discovery deadline?

I await your response.

Thanks.

Michael R. Nevarez
Attorney at Law

The Nevarez Law Firm, PC
Attorneys And Counselors At Law

Mailing Address:

P.O. Box 12247

El Paso, TX 79913

Telephone: (915) 225-2255

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Website: <http://www.NevarezLawFirm.com/>

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From: MNevarez@LawOfficesMRN.com <MNevarez@LawOfficesMRN.com>
Sent: Wednesday, December 6, 2023 4:02 PM
To: 'Chris Miltenberger' <chris@crmlawpractice.com>
Cc: paralegal-2@lawofficesmrn.com
Subject: RE: Cause #3:22-cv-00301-FM; Callier v. PAC WESTERN FINANCIAL LLC et al

Mediator Antcliff is good, but I don't know if he's available soon, as I believe he's having surgery.

El Paso Dispute Resolution is free and could probably be available.

Anyone is fine with me though.

Please schedule and let me know.

Michael R. Nevarez
Attorney at Law

The Nevarez Law Firm, PC
Attorneys And Counselors At Law
Mailing Address:
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From: Chris Miltenberger <chris@crmlawpractice.com>
Sent: Wednesday, December 6, 2023 11:21 AM
To: mnevarez@lawofficesmrn.com
Cc: paralegal-2@lawofficesmrn.com
Subject: RE: Cause #3:22-cv-00301-FM; Callier v. PAC WESTERN FINANCIAL LLC et al

Michael, we had an ADR deadline of December 26. I missed this deadline. Do you have someone local we can use on short notice?

Depositions will have to be after the first of the year.

Thank you.

Chris Miltenberger, Esq.

Law Office of Chris R. Miltenberger, PLLC

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From: mnevarez@lawofficesmrn.com <mnevarez@lawofficesmrn.com>

Sent: Thursday, November 30, 2023 1:33 PM

To: Chris Miltenberger <chris@crmlawpractice.com>

Cc: paralegal-2@lawofficesmrn.com

Subject: RE: Cause #3:22-cv-00301-FM; Callier v. PAC WESTERN FINANCIAL LLC et al

Chris,

As concerns the attached notice of deposition of Scott, which I received today, after our telephone conversation this morning, I was able to confirm Mitchell Scott is available for Zoom deposition any time after Dec. 11th, from 12-4 PM CST, but not before. Therefore, his deposition would have to be taken after the December 11, 2023, deadline for completion of discovery, under the Amended Scheduling Order.

I will agree to continue discovery beyond said discovery deadline, for Scott's deposition, provided you agree to make Callier available for deposition, at my office on Remcon street, after said deadline as well. Please provide proposed dates for Callier's deposition, so I can make arrangements with a court reporter, and send you a notice of deposition.

As concerns copies of Jascott Investments' documents, I will provide you with electronic copies, uploaded to DropBox in accordance with your request this morning. It should take a couple of days or so, as I will need to bates stamped said documents/files.

Let me know, if you agree to the foregoing.

Thanks.

Michael R. Nevarez
Attorney at Law

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Attorneys And Counselors At Law
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From: Chris Miltenberger <chris@crmlawpractice.com>
Sent: Thursday, November 30, 2023 11:23 AM
To: mnevarez@lawofficesmrn.com
Cc: paralegal-2@lawofficesmrn.com
Subject: RE: Cause #3:22-cv-00301-FM; Callier v. PAC WESTERN FINANCIAL LLC et al

Michael, thank you for visiting with me today. I did not realize Mr. Scott is in MN. I will conduct the deposition by Zoom.

Please confirm availability.

Thank you.

Chris Miltenberger, Esq.

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From: Chris Miltenberger

Sent: Thursday, November 30, 2023 9:22 AM

To: mnevarez@lawofficesmrn.com

Cc: paralegal-2@lawofficesmrn.com

Subject: RE: Cause #3:22-cv-00301-FM; Callier v. PAC WESTERN FINANCIAL LLC et al

Michael, attached is a notice of deposition for Mitchell Scott. I have tried to work out an agreeable time but have not received any dates from you.

Please confirm receipt.

Thank you.

Chris Miltenberger, Esq.

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From: mnevarez@lawofficesmrn.com <mnevarez@lawofficesmrn.com>
Sent: Wednesday, November 29, 2023 11:44 AM
To: Chris Miltenberger <chris@crmlawpractice.com>
Cc: paralegal-2@lawofficesmrn.com
Subject: RE: Cause #3:22-cv-00301-FM; Callier v. PAC WESTERN FINANCIAL LLC et al

Chris,

Are you intending to take the deposition of Mich over Zoom?

Are you going to come to my office for inspection and copying prior to Mitch's deposition?

Michael R. Nevarez
Attorney at Law

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